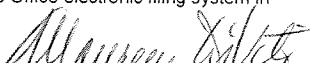


I hereby certify that this paper (along with any paper referred to as being attached or enclosed) is being transmitted via the Office electronic filing system in accordance with § 1.6(a)(4).

Dated: March 28, 2008

Signature:


(Maureen Divito)

Docket No.: 1801270.00138US1
(PATENT)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant: Ian G. Bolton et al. Confirmation No.: 7395
Application No.: 10/749,052 Art Unit: 2192
Filed: December 30, 2003 Examiner: E. B. Kiss
Title: PARTIAL DEAD CODE ELIMINATION OPTIMIZATIONS FOR
PROGRAM CODE CONVERSION

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

AMENDMENT IN RESPONSE TO NON-FINAL OFFICE ACTION

Dear Sir:

INTRODUCTORY COMMENTS

In response to the Office Action dated October 2, 2007, please amend the above-identified U.S. patent application as follows:

Amendments to the Claims are reflected in the listing of claims which begins on page 2 of this paper.

Remarks/Arguments begin on page 13 of this paper.